

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
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This document relates to:

Federal Insurance Co., et al. v. Al Qaida, et al., Case No. 03-cv-06978 (GBD)(SN)
Thomas Burnett, Sr., at al. v. Al Baraka Inv. & Dev. Corp., et al., Case No. 03-cv-09849 (GBD)(SN)
Kathleen Ashton, et al v. Al Qaeda Islamic Army, et al., Case No. 02-cv-06977 (GBD)(SN)
Estate of John P. O'Neill, Sr., et al. v. Al Baraka, et al., Case No. 04-cv-01923 (GBD)(SN)
Continental Casualty Co., et al. v. Al Qaeda, et al., Case No. 04-cv-05970 (GBD)(SN)
Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd., et al., Case No. 04-cv-07065 (GBD)(SN)
Euro Brokers, Inc., et al. v. Al Baraka, et al., Case No. 04-cv-07279 (GBD)(SN)

**DECLARATION OF JERRY S. GOLDMAN, ESQ. IN SUPPORT OF PLAINTIFFS'
MOTION FOR SANCTIONS AGAINST DEFENDANTS MUSLIM WORLD LEAGUE
AND INTERNATIONAL ISLAMIC RELIEF ORGANIZATION**

Jerry S. Goldman affirms, under penalty of perjury, as follows:

1. I am an attorney admitted to practice in this Court and a Shareholder of the law firm Anderson Kill. I am a member of the Plaintiffs' Executive Committees that have been formed in these 9/11 matters. I submit this Declaration to substantiate certain representations and to transmit to the Court the following documents submitted in support of Plaintiffs' Memorandum of Law in Support of Plaintiffs' Motion for Sanctions Against Defendants Muslim World League ("MWL") and International Islamic Relief Organization ("IIRO").

2. Mr. Martin McMahon was from the outset, and continuing through the present, counsel of record for defendants MWL and IIRO.

3. In January 2013, the Lewis Baach law firm additionally entered appearance on behalf of defendants MWL and IIRO, and continues to co-represent those defendants.

4. Attached hereto as Exhibit 1 is a true and correct copy of the Affirmation of J. Scott Tarbutton, Esq. and accompanying exhibits in support of Plaintiffs' Letter Motion for Sanctions, dated August 26, 2011.

5. Attached hereto as Exhibit 2 is a true and correct copy of Plaintiffs' Letter Motion for Sanctions, dated August 26, 2011.

6. Attached hereto as Exhibit 3 is a true and correct copy of the Letter Reply in Further Support of Sanctions, dated October 14, 2011.

7. Attached hereto as Exhibit 4 is a true and correct copy of the Affirmation of J. Scott Tarbutton, Esq. and accompanying exhibits in support of Plaintiffs' Letter Reply Motion for Sanctions dated October 14, 2011.

8. Attached hereto as Exhibit 5 is a true and correct copy of a status letter from plaintiffs to Judge Netburn, dated April 14, 2017 (ECF No. 3516.)

9. Attached hereto as Exhibit 6 is a Timeline of plaintiffs' efforts to obtain documents from MWL and IIRO and the dates on which documents were produced by these defendants.

10. Attached hereto as Exhibit 7 is a true and correct copy of the Transcript of the April 12, 2011 hearing before Judge Maas.

11. Attached hereto as Exhibit 8 is a true and correct copy of the Transcript of the April 26, 2011 hearing before Judge Maas.

12. Attached hereto as Exhibit 9 is a true and correct copy of the Transcript of the June 23, 2011 hearing before Judge Maas.

13. Attached hereto as Exhibit 10 is a true and correct copy of the Transcript of the July 13, 2011 hearing before Judge Maas.

14. Attached hereto as Exhibit 11 is a true and correct copy of the Transcript of the November 16, 2011 hearing before Judge Maas.

15. Attached hereto as Exhibit 12 is a true and correct copy of a letter transmitted by fax from Mr. Martin McMahon to Judge Maas, dated April 11, 2012.

16. Attached hereto as Exhibit 13 is a true and correct copy of the Notice of Appearance filed by the Lewis Baach law firm, dated January 8, 2013.

17. Attached hereto as Exhibit 14 is a true and correct copy of an email from Lewis Baach to counsel for plaintiffs, dated May 1, 2013.

18. Attached hereto as Exhibit 15 is a true and correct copy of the Transcript of the June 23, 2013 hearing.

19. Attached hereto as Exhibit 16 is a true and correct copy of Letter from IIRO/MWL to Judge Daniels, dated November 28, 2007.

20. Attached hereto as Exhibit 17 is a true and correct copy of letter from Lewis Baach to PEC, dated April 25, 2016.

21. Attached hereto as Exhibit 18 is a true and correct copy of MWL and IIRO's brief in opposition to the PEC's motion for sanctions, dated September 26, 2011.¹

22. Attached hereto as Exhibit 20 is a true and correct copy of cover letter and index for new document production from Lewis Baach, dated July 29, 2014.

23. Attached hereto as Exhibit 21 is a true and correct copy of a cover letter and index for new document production from Lewis Baach, dated February 11, 2015.

¹ Exhibit 19 omitted intentionally.

24. Attached hereto as Exhibit 22 is a true and correct copy of a cover letter and index for new document production from Lewis Baach (IIRO), dated July 17, 2015.

25. Attached hereto as Exhibit 23 is a true and correct copy of a cover letter and index for new document production from Lewis Baach (MWL), dated July 17, 2015.

26. Attached hereto as Exhibit 24 is a true and correct copy of a cover letter and index for new document production from Lewis Baach, dated July 31, 2015.

27. Attached hereto as Exhibit 25 is a true and correct copy of a cover letter and index for new document production from Lewis Baach, dated March 22, 2016.

28. Attached hereto as Exhibit 26 is a true and correct copy of a cover letter and index for new document production from Lewis Baach (IIRO), dated December 30, 2016.

29. Attached hereto as Exhibit 27 is a true and correct copy of a cover letter and index for new document production from Lewis Baach (MWL), dated December 30, 2016.

30. Attached hereto as Exhibit 28 is a true and correct copy of a cover letter and index for new document production from Lewis Baach (IIRO), dated March 1, 2017.

31. Attached hereto as Exhibit 29 is a true and correct copy of a cover letter and index for new document production from Lewis Baach (MWL), dated March 1, 2017.

32. Attached hereto as Exhibit 30 is a true and correct copy of a cover letter and index for new document production from Lewis Baach, dated August 4, 2017.

33. Attached hereto as Exhibit 31 is a true and correct copy of MWL's Responses to Plaintiffs' 1st Set of Requests for Production of Documents, dated January 19, 2006. (*See*, Answers 29, 74.)

34. Attached hereto as Exhibit 32 is a true and correct copy of IIRO's Responses to the Plaintiffs' 1st Set of Requests for Production of Documents, dated February 24, 2006 (*See*, Answers 42, 50.)

35. Attached hereto as Exhibit 33 is a true and correct copy of IIRO's 1st Supplemental Responses to Plaintiffs' 1st Requests for Production of Documents, dated October 8, 2008. (*See*, Answers 29, 34, 35, 38, 43, 51, 82, 83.)

36. Attached hereto as Exhibit 34 is a true and correct copy of IIRO's Response to Plaintiffs 2nd Set of Supplemental Requests for Production of Documents, dated April 28, 2008. (*See*, Answer 15, 19.)

Executed in New York, New York on December 1, 2017.

/s/ Jerry S. Goldman
Jerry S. Goldman, Esq.